

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JUAN ZAMORA, and FRANCISCO)	
ZAMORA, on behalf of themselves, and all)	
other Plaintiffs similarly situated, known and)	No. 1:12-cv-02020
unknown,)	
)	Honorable Judge Joan B. Gottschall
Plaintiffs,)	
)	Magistrate Judge Maria Valdez
v.)	
)	
THE BRICKMAN GROUP LTD.,)	
)	
Defendant.)	
)	

**JOINT MOTION FOR PRELIMINARY APPROVAL OF THE PARTIES’
STIPULATION OF SETTLEMENT AND FOR APPROVAL OF CLASS
CERTIFICATION, FORM AND MANNER OF CLASS NOTICE, AND SCHEDULING
FAIRNESS HEARING FOR FINAL APPROVAL OF SETTLEMENT**

Plaintiffs Juan Zamora, Francisco Zamora, and Rafael Gonzales (“Plaintiffs”), on behalf of themselves and all others similarly situated, with the agreement of Defendant, move this Court for an order preliminarily approving the Parties’ Stipulation of Settlement (attached to the accompanying memorandum, filed contemporaneously herewith as Exhibit 1) and an order approving class certification for settlement purposes, the form and manner of class notice (attached to the memorandum as Exhibit 2), and scheduling a Fairness Hearing for final approval of settlement. In further support of this Joint Motion, the Parties have contemporaneously filed a memorandum in support, which is incorporated herein by reference.

[Signature Follows Next Page]

Jointly submitted,

Electronically Filed 11/19/2013

/s/ John W. Billhorn

John William Billhorn

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Plaintiffs similarly situated, known or
unknown

DEFENDANT
THE BRICKMAN GROUP LTD. LLC

By: /s/ Michael D. Ray
One of Its Attorneys

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CERTIFICATE OF SERVICE

Please take notice that the foregoing Motion was filed electronically via the Court's electronic filing system this 19th day of November, 2013. Service will be made via operation of that system upon:

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